

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Enthone, Inc.
9809 Industrial Drive
Bridgeview, IL 60455**

ATTENTION:

**Guy Racino
HSE Manager-Enthone Americas**

**James Sharp
Plant Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Enthone, Inc. (Enthone or you) to submit certain information about the facility at 9809 Industrial Drive, Bridgeview, IL 60455. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit and the actions you must take. You must send responsive information to us according to the schedule outlined in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information as well as monitoring and testing. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Enthone owns and operates an emission source in Bridgeview, Illinois (the facility). We are requesting certain information and testing to determine whether your emission source is complying with the Illinois State Implementation Plan, the National Emission Standards for

Hazardous Air Pollutants for Chemical Preparations Industry at 40 C.F.R. Part 63, Subpart
BBBBBBB, and the Clean Air Act.

Enthone must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Enthone must submit all required information under an authorized signature with the
following certification:

I certify under penalty of law that I have examined and am familiar with the
information in the enclosed documents, including all attachments. Based on my
inquiry of those individuals with primary responsibility for obtaining the
information, I certify that the statements and information are, to the best of my
knowledge and belief, true and complete. I am aware that there are significant
penalties for knowingly submitting false statements and information, including
the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean
Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business
confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to
us. Information subject to a business confidentiality claim is available to the public only to the
extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not
assert a business confidentiality claim when you submit the information, EPA may make this
information available to the public without further notice. You should be aware, moreover, that
pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data,
standards and limitations are not entitled to confidential treatment and shall be made available to
the public notwithstanding any assertion of a business confidentiality claim. Appendix C
provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject Enthone to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Shilpa Patel at (312) 886-0120 or Patel.shilpa@epa.gov.

1/16/15
Date


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each disk or drive so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number. In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. The term "representative (normal) conditions" shall mean conditions that represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable emission standards, but without creating an unsafe condition. If operating at maximum capacity would result in the highest levels of emissions, operating at this level would not create an unsafe condition, and the facility expects to operate at that level at least some of the time, the facility should conduct a stack test at maximum capacity or the allowable/permitted capacity.

Appendix B

Information You Are Required to Submit to EPA

Enthone must respond to this information request pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a). Enthone must submit the following information and conduct emission testing in accordance with the following schedule:

Submit Testing Protocol(s)	No later than 30 days after receipt of this request
Submit Notification of Intent to Test	No less than 21 days before testing
Conduct emissions Testing	No later than 65 days after receipt of this request
Submit Final Testing Report	No later than 30 days after completion of the emission testing

1. Enthone must submit to EPA and the Illinois Environmental Protection Agency (IEPA) a proposed testing protocol no later than 30 days after receipt of this request. The testing protocol must completely describe the methods and procedures to be used for the emissions testing required by this request. The testing protocol must also address the requirements of Paragraph 3 below.
2. Enthone must submit to EPA and IEPA a notification of intent to test no less than 21 days before performing the emissions testing required by this request. The intent to test must identify the dates, times, methods to be used, and other relevant information related to the emissions testing required by this request.
3. Enthone must conduct emission testing specified by § 63.11582(b) at scrubbers 2, 3, 4, and 5 no later than 65 days after receipt of this request. The emissions testing must, at a minimum, be conducted under conditions that represent normal operations and result in adequate data to establish an appropriate range for each parameter including but not limited to differential pressure, pH, scrubber liquor flow, and air flow within which emissions testing demonstrates compliance with applicable particulate matter (PM) emission rates and PM removal efficiencies. Additionally, the emissions testing must meet the requirements identified below.
 - a. Emissions testing must be conducted at the inlet and outlet of each scrubber.
 - b. Emissions testing must be conducted using EPA Reference Methods specified in 40 C.F.R. Part 63, Subpart BBBBBBB, Table 3.
 - c. Each emissions test must consist of at least three, one-hour runs.
 - d. Each emissions test must be conducted while all the blenders and mixing tanks associated with each scrubber being tested are operating under conditions representative of normal operation.
 - e. Each emission test must be conducted while all emissions from all associated blenders and mixing tanks are being routed to each respective scrubber.
 - f. Enthone must use a powder-based raw material in all blenders and mixing tanks during each emissions test.

- g. Each emissions test must quantify the mass emission rate of particulate matter (PM) in the inlet and outlet stream of each scrubber in both pounds per hour (lb/hr) and grains per dry standard cubic feet (gr/dscf).
 - h. Each emissions test must determine the PM removal efficiency (in percent) for each scrubber based on the inlet and outlet PM mass concentrations measured during the emissions testing.
 - i. Enthone must monitor and record the pressure drop across each scrubber and the pH of the scrubbing liquor at least once every 15 minutes during the entirety of each emissions test. Additionally, Enthone must measure and record the scrubber liquor flow rate into each scrubber and air flow rate into each scrubber at least once every 15 minutes during the entirety of each emissions test.
4. Enthone must submit a final report for the testing required by this request no later than 30 days after completion of the emissions testing. The final report must include, at a minimum, the information identified below.
- a. Summary of Results
 - i. Results of the above specified emissions tests;
 - ii. Process and control equipment data related to operation and determining compliance;
 - iii. Discussion of test errors;
 - iv. Discussion of any deviations from the reference test methods;
 - v. Production data; and
 - vi. Calculation of an appropriate range for each parameter, including but not limited to differential pressure, pH, scrubber liquor flow, and air flow within which emissions testing demonstrates compliance with applicable PM emission rates and PM removal efficiencies.
 - b. Scrubber and Mixer Operations
 - i. Description of the process and control equipment in operation;
 - ii. Operating parameters of each scrubber and its related equipment at the time of the test, including but not limited to, differential pressure, pH, scrubber liquor flow, and air flow;
 - iii. Description and amounts, in pounds, of all raw materials added to each blender and/or mixing tank during the test; including the amount of powder-based raw material added in accordance with Paragraph 3.f., and metals content of that powder-based raw material.
 - c. Sampling and Analytical Procedures
 - i. Sampling port location(s) and dimensions of cross-section;
 - ii. Sampling point description, including labeling system;

- iii. Brief description of sampling procedures, including equipment and diagram;
 - iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 - v. Brief description of analytical procedures, including calibration;
 - vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and,
 - vii. Quality control/ quality assurance procedures, tests and results.
- d. Appendix
- i. Complete results with example calculations using data obtained during the emissions test;
 - ii. Raw field data (original, not computer printouts);
 - iii. Laboratory report, with signed chain-of-custody forms;
 - iv. Calibration procedures and results;
 - v. Raw process and control equipment data, signed by plant representative;
 - vi. Test log;
 - vii. Project participants and titles; and,
 - viii. Related correspondence.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A),(B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

James Sharp
Plant Manager
Enthone, Inc.
9809 Industrial Drive
Bridgeview, Illinois 60455

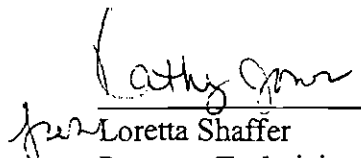
Guy Racino
HSE Manager, Americas
Enthone, Inc.
350 Frontage Road
West Haven, Connecticut 06516

7011 1150 0000 2640 6004

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Eric Jones, Manager
Compliance Unit
Bureau of Air
Illinois Environmental Protection Agency
P.O. Box 19506
Springfield, Illinois 62794

On the 20th day of January 2015.



Loretta Shaffer
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7011 1150 0000 2640 5960